

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of)	FCC 94-54
)	
Equal Access and Interconnection)	CC Docket No. 94-54
Obligations Pertaining to)	RM 8012
Commercial Mobile Radio Service)	

To: The Commission

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Aug 4 '94

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MOTION FOR EXTENSION OF TIME TO COMMENT

The Rural Cellular Association ("RCA"), by its attorney and pursuant to Rule Section 1.46, hereby requests the Federal Communications Commission ("Commission" or "FCC") to grant a thirty day extension of time to respond to the issues raised in the Notice of Proposed Rulemaking and Notice of Inquiry ("NPRM") released July 1, 1994 in the above-captioned proceeding.

RCA is an association comprised of thirty-two small cellular operators providing service to rural America. RCA has devoted a significant amount of its resources to participation in numerous proceedings related to the Commission's implementation of the Omnibus Budget Reconciliation Act of 1993 ("Budget Act"). The RCA believes that it is extremely important for the Commission to develop a full and complete record with respect to the issues raised in this docket. In order to do so, the Commission needs to hear from both large and small cellular carriers as well as other CMRS providers.

RCA commends the FCC for the expedient action it has taken to implement the Budget Act, with respect to its adoption of rules governing competitive bidding and the regulatory treatment of

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Commercial Mobile Radio Services. However, in light of the complexity of the instant proceeding and its potential impact on small cellular operators, RCA requires additional time to gather information from its member companies concerning the affect of the imposition of equal access requirements and the expansion of interconnection requirements on their operations.

Under normal circumstances the RCA would have been able to timely respond to these issues raised in the NPRM. However, the Commission's timing with respect to the release of the NPRM has created significant difficulty for RCA. The NPRM was released on Friday, July 1, 1994, the beginning of a long holiday weekend and was not available for public distribution until July 5, 1994. Although the NPRM established August 29, 1994 as the deadline for filing comments in the proceeding, the period for formulating comments falls at a time when the general population takes its summer vacation.¹ As a result, the RCA has had great difficulty coordinating with and receiving input from its member companies. RCA's next regularly scheduled meeting is not until September 6, 1994. Accordingly, the RCA beseeches the Commission to grant its request for a thirty day extension of time so that it can be afforded the opportunity to discuss these complicated issues with its member companies and formulate the rural cellular perspective.

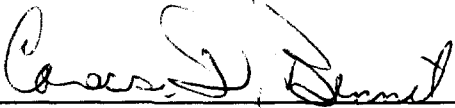
¹ In the Commission's August 2, 1994 Open Meeting, Chairman Reed Hundt noted that the month of August was a time when the commissioners and other FCC employees would be taking a much needed hiatus. Chairman Hundt also announced that the next Commission open meeting would not be until September 19, 1994 in order to accommodate various FCC staff vacation schedules.

The RCA is aware that GTE Service Corporation ("GTE") requested a similar extension so that GTE can respond fully to the complicated issues raised by the NPRM. According to GTE's "Motion for Extension of Time to Comment" ("Motion"), GTE is the second largest cellular company in the United States. If GTE cannot adequately meet the Commission's deadline with its vast resources, RCA with its limited resources will, in all likelihood, not be able to do its part to develop an accurate and comprehensive record in this proceeding. Failure on the part of the Commission to formulate its decision based upon a complete and accurate record disservices the public interest. An additional thirty days in which to more accurately develop the record in this proceeding would not prejudice any party and would assure that the Commission is given the opportunity to hear from all interested parties.

For the foregoing reasons, the RCA respectfully requests the Commission to grant its motion and extend the comment period for an additional thirty days.

Respectfully submitted,

RURAL CELLULAR ASSOCIATION

By: 
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August 4, 1994

CERTIFICATE OF SERVICE

I, Caressa D. Bennet, certify that on August 4, 1994, I caused a copy of the foregoing "Comments in Support of Motion for Extension of Time to Comment" to be served by first-class mail, postage prepaid to the following:

* denotes hand delivery

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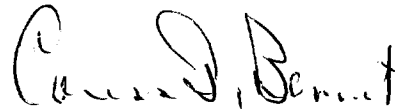
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A handwritten signature in cursive script, reading "Caressa D. Bennet", positioned above a horizontal line.

Caressa D. Bennet